

Exhibit 6

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(OAKLAND DIVISION)

MEIJER, INC. & MEIJER
DISTRIBUTION, INC., on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

ABBOTT LABORATORIES,

Defendant.

ROCHESTER DRUG CO-
OPERATIVE, INC., on behalf of itself
and all others similarly situated,

Plaintiff,

v.

ABBOTT LABORATORIES,

Defendant.

LOUISIANA WHOLESALE DRUG
COMPANY, INC., on behalf of itself
and all others similarly situated,

Plaintiff,

v.

ABBOTT LABORATORIES,

Defendant.

Case No. C 07-5985 CW

Hon. Claudia Wilken

Case No. C 07-6010 CW

Hon. Claudia Wilken

**DECLARATION OF
KEVIN HURN CONCERNING
BURDENSONENESS OF DISCOVERY THE
SALES AND PROFITS OF MEIJER, INC.
AND MEIJER DISTRIBUTION, INC. ON
ANTIRETROVIRAL PHARMACEUTICALS**

Case No. C 07-6118 CW

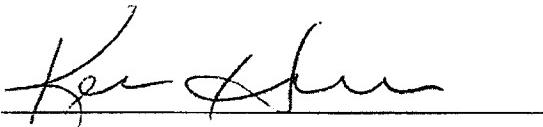
Hon. Claudia Wilken

I, Kevin Hurn, do declare as follows:

1. My name is Kevin Hurn, and I am employed as the Merchandise Manager for the purchase of prescription drugs by Meijer, Inc. and Meijer Distribution, Inc. ("Meijer"), a plaintiff in this litigation.
2. Meijer (through its assignment from Frank W. Kerr Co.) purchases Norvir and Kaletra directly from defendant Abbott Laboratories ("Abbott") and has done so for many years and continues to do so today.
3. I have reviewed the Document Requests and Interrogatories propounded by Defendant as well as the responses and objections prepared on behalf of Meijer in response to these discovery requests.
4. I understand that Abbott is seeking to compel the production of documents and data reflecting Meijer's sales of Norvir, Kaletra, Lexiva, and Reyataz and (potentially) many other antiretroviral drugs to its customers. I further understand that Abbott is seeking information concerning Meijer's profitability on these downstream sales transactions.
5. Gathering and producing the documents and data requested by Abbott in the disputed discovery requests at issue would entail significant expense and burden on Meijer. Responding to Abbott's request would require Meijer to review tens (if not hundreds) of thousands of transactions reflecting our sales of the relevant products to hundreds of customers over many years. This would involve gathering paper and electronic records from a number of sources including computer systems. It would be extremely expensive, time-consuming, and laborious.
6. In addition, the requested information, which includes the names of Meijer's customers, is extremely sensitive and highly confidential.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: May 22, 2008



Kevin Hurn